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NEC ELECTRONICS CORPORATION and
NEC ELECTRONICS AMERICA, INC.

[Other Counsel and Defendants Appear on Signature Page]

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

IN RE STATIC RANDOM ACCESS
MEMORY (SRAM) ANTITRUST
LITIGATION

Case No. M:07-CV-01819-CW

MDL No. 1819

**STIPULATION AND ORDER TO EXTEND
TIME FOR DEFENDANTS TO FILE
UNREDACTED DOCUMENTS
PURSUANT TO THE COURT'S JUNE 5,
2009 ORDER**

This Document Relates to:

ALL INDIRECT PURCHASER ACTIONS

WHEREAS, on April 30, 2009, Defendants filed their Opposition to Class Certification ("Opposition Brief") along with the declaration of Patrick M. Ryan, and exhibits thereto ("Ryan Exhibits"), and the declaration of Michelle M. Burtis, Ph.D ("Burtis Declaration"), and exhibits thereto ("Burtis Exhibits").

WHEREAS, Defendants filed their Opposition Brief, the Burtis Declaration, and certain Ryan Exhibits and Burtis Exhibits under seal because these documents contain nonpublic, confidential, proprietary and competitively sensitive information of the Defendants and third parties.

1 WHEREAS, on May 1, 2009, Defendants filed an Amended Administrative Motion to Seal
2 Portions of Documents Pursuant to Local Rule 7-11 and 79-5 ("Motion to Seal"), and the declaration
3 of Eva Chan in support thereof;

4 WHEREAS, the declaration of Eva Chan filed in support of Defendants' Motion to Seal
5 attached as Exhibit A lists of confidential third-party information in the Opposition Brief, Burtis
6 Declaration, Burtis Exhibits, and Ryan Exhibits;

7 WHEREAS, certain third parties filed declarations and proposed orders in support of the
8 Motion to Seal;

9 WHEREAS, on May 7, 2009, third-party Avnet filed its own motion to seal and the
10 declaration of Claire M. Korenblit in support thereof;

11 WHEREAS, on June 5, 2009, the Court granted in part and denied in part Defendants'
12 Motion to Seal and did not set forth a deadline within which Defendants shall file the unredacted
13 portions of documents the Court ordered to be filed in the public record;

14 WHEREAS, the Court has not ruled specifically on third-party Avnet's motion to seal;

15 WHEREAS, on June 10, 2009, the Defendants filed an Errata to the Motion to Seal to correct
16 the inadvertent omission of Burtis Exhibit 50 from the Motion to Seal, and requested that the exhibit
17 be sealed in its entirety;

18 WHEREAS, certain third parties whose data and information was ordered to be filed in the
19 public record in the Court's June 5, 2009 Order have communicated to Defendants that they wish to
20 file additional support with the Court to maintain certain of their confidential data and information
21 under seal;

22 WHEREAS, in order to allow the Court time to rule on Defendants' request to keep Burtis
23 Exhibit 50 under seal in its entirety, to allow third parties sufficient time to file additional support
24 with the Court, and to allow the Court time to rule on the Avnet motion to seal, the parties agree that
25 Defendants may have up until June 26, 2009 to file in the public record unredacted versions of
26 portions of the Opposition Brief, Burtis Declaration, Burtis Exhibits, and Ryan Exhibits pursuant to
27 the Court's June 5, 2009 Order or any superseding subsequent Orders.

28 NOW THEREFORE, it is hereby stipulated by the undersigned counsel on behalf of the

parties identified below, and subject to the Court's approval, that:

Defendants shall file in the public record, by June 26, 2009, unredacted versions of all portions of the Opposition Brief, Burtis Declaration, Burtis Exhibits, and Ryan Exhibits not sealed by the Court in its June 5, 2009 Order or any superseding subsequent Orders.

Dated: June 10, 2009

By: /s/ Patrick M. Ryan

PATRICK M. RYAN
WINSTON & STRAWN LLP

Liaison Counsel for Defendants

Dated: June 10, 2009

By: /s/ Francis O. Scarpulla

FRANCIS O. SCARPULLA
ZELLE, HOFFMANN, VOELBEL
& MASON LLP

*Interim Lead and Liaison Counsel for
Indirect-Purchaser Class*

Additional Defendants and Counsel:

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WHITE & CASE LLP

By /s/ Belinda Lee

Belinda Lee
Attorneys for Defendants
Toshiba Corporation and Toshiba
America Electronic Components, Inc.

By /s/ Matthew S. Leddicotte

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Hynix Semiconductor America Inc.

McDERMOTT WILL & EMERY LLP

**SHEPPARD, MULLIN, RICHTER &
HAMPTON LLP**

1 By /s/ Craig P. Seebald
2 Craig P. Seebald (*pro hac vice*)
3 Vincent van Panhuys (*pro hac vice*)
4 Attorneys for Defendants Renesas
5 Technology Corp., Renesas Technology
6 America, Inc., Mitsubishi Electric
7 Corporation, and Mitsubishi Electric &
8 Electronics USA, Inc.

By /s/ James L. McGinnis
James L. McGinnis
Attorneys for Defendants
Samsung Electronics America, Inc.,
Samsung Electronics Company, Ltd., and
Samsung Semiconductor, Inc

6 I, Patrick M. Ryan, hereby attest, pursuant to N.D. Cal. General Order No. 45, that the
7 concurrence to the filing of this document has been obtained from each signatory hereto.
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10 /s/ Patrick M. Ryan
Patrick M. Ryan

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1 **IT IS SO ORDERED.**

2
3 Dated: 6/12 _____, 2009



THE HONORABLE CLAUDIA WILKEN
United States District Judge
Northern District of California

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